

Exhibit 13

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

DEMOCRACY NORTH CAROLINA;
NORTH CAROLINA BLACK ALLIANCE;
LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA,

CASE NO.
1:23CV00878-TDS-
JEP

Plaintiffs,

vs.

ALAN HIRSCH, in his official
capacity as CHAIR OF THE STATE
BOARD OF ELECTIONS; JEFF
CARMON III, in official
capacity as SECRETARY OF THE
STATE BOARD OF ELECTIONS;
STACY EGGERS IV, in his
official capacity as MEMBER OF
THE STATE BOARD OF ELECTIONS;
KEVIN LEWIS, in his official
Capacity as MEMBER OF THE
STATE BOARD OF ELECTIONS;
SIOBHAN O DUFFY MILLEN, in her
official capacity as MEMBER OF
THE STATE BOARD OF ELECTIONS;
KAREN BRINSON BELL, in her
official capacity as EXECUTIVE
DIRECTOR OF THE STATE BOARD OF
ELECTIONS; NORTH CAROLINA
STATE BOARD OF ELECTIONS,

Defendants.

VIDEOTAPED 30(b)(6) DEPOSITION OF
NORTH CAROLINA ELECTION INTEGRITY TEAMS
By JAMES K. WOMACK, JR.

(Taken by Plaintiffs)

Raleigh, North Carolina

September 19, 2024

Reported by Andrea L. Kingsley, RPR

1 if the person voted and the address verification
2 was rejected, you can't undo the vote. So the
3 vote -- there were examples of people that voted
4 through same day registration that voted and then
5 the address wasn't verified and there's nothing you
6 can do to correct that because the vote counted the
7 and the canvass was over.

8 Q. Do you remember what statutory code --
9 let me say what the scheme at the time -- what in
10 the way of requirements on the county boards of
11 elections for the timing of those mailers the scheme
12 had?

13 A. I don't recall.

14 Q. If I said it just required that there
15 was those mailers were sent in a reasonable amount
16 of time, would that sound right to you?

17 A. Probably. Yes.

18 Q. Do you have any awareness of how 747
19 changed that language?

20 A. 747 required -- by the way, this was not
21 our suggestion. Not our suggestion. This is not
22 an NCEIT thing, this appeared in 747. Just to
23 clarify the record, my organization, after studying
24 the same day registration thoroughly, my
25 organization advocated for elimination of same day

1 registration as all other southern states did. We
2 were the only southern state doing it and I was
3 arguing that we should not do it as well because of
4 the disparate treatment of voters because now
5 you're treating same day registrants differently
6 than you treat normal voters. But the 747
7 provision was to verify the address through mailer
8 which I never -- I was never consulted on that and
9 nobody in my organization was consulted and we
10 would have disagreed with that, but that's not --
11 there are many things that happened that we don't
12 agree with.

13 Q. We're going to get to all of that. I
14 promise.

15 A. I'm sure we will.

16 Q. But it's your understanding that the
17 post 747 timing of that mailer changed or no?

18 A. It did. Absolutely did. A judge ruled
19 that that was impractical, Judge Schroeder ruled
20 that was impractical because -- and it is. As a
21 matter of fact. If someone votes on Saturday,
22 you're not going to get a verification before
23 Monday or Tuesday. It's just not going to happen
24 before the canvass. So I understand that.
25 Especially with the US Postal Service these days.